IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF HAWAI'I

VINCENT KHOURY TYLOR and) Case No. CV 14-00069 JMS-RLP
VINCENT SCOTT TYLOR,)
) DECLARATION OF
Plaintiffs,) LOUISE K. Y. ING
)
v.)
)
MARRIOTT INTERNATIONAL,)
INC., a Delaware Corporation,)
dba COURTYARD BY MARRIOTT)
WAIKIKI BEACH AND/OR)
COURTYARD WAIKIKI BEACH;)
JOHN DOES 1-10; JANE DOES 1-10;)
DOE CORPORATIONS 1-10; DOE)
PARTNERSHIPS 1-10; AND DOES)
ASSOCIATIONS 1-10,)
)
Defendants.)
)

DECLARATION OF LOUISE K. Y. ING

- I, LOUISE K. Y. ING, do hereby state and declare as follows:
- 1. I am an attorney with the law firm of Alston Hunt Floyd & Ing, attorneys for Defendant Marriott International, Inc. ("Defendant" or "Marriott") in this action.
- 2. I make this declaration based on my personal knowledge and am competent to testify as to the matters set forth herein. This Declaration is made in support of Defendant Marriott International, Inc.'s Memorandum in

Opposition to Plaintiffs' Motion to Defer or Deny Defendant's Motion for Partial Summary Judgment. [Dkt. 33]

3. On May 14, 2014, the parties participated in the Rule 16 conference. After the conference, I recall discussing various aspects of the case and orally informing Stephen Street of the limit of my settlement authority. I recall that Mr. Street indicated to me at that time or later that he was not interested in a counteroffer at the level for which I had authority.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of October, 2014, at Honolulu, Hawai'i.

LOUISE K. Y. ING